

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Trudy B. Grant, Sarah Krawcheck,)
Nashonda Hunter, Max Milliken,)
Jordan Mapp, and Caleb Clark,)

Plaintiffs,)

v.)

Howard Knapp as the Executive)
Director of the South Carolina)
Election Commission, Dennis Shedd)
(Chair), JoAnne Day, Clifford J.)
Edler, Linda McCall and Scott)
Moseley, as Members of the South)
Carolina Election Commission, and)
Charleston County Board of)
Elections and Voter Registration,)

Defendants.)

Case No.: 2:23-cv-06838-BHH

Plaintiff Hunter's Answers to State Defendants' First Interrogatories

Plaintiff Nashonda Hunter provides the following answers to Election Defendants' First Set of Interrogatories.

Definitions and Instructions are as specified in the Interrogatories, with the following supplementation:

ANSWERS

1. For each of the Plaintiffs, state your full name, any/and all prior names, including aliases or nicknames, dates of birth, Social Security numbers, your current address, and all addresses for the years 2008 through the present. For each address, document the inclusive months and years you lived at each address and whether you owned or rented each address.

Answer: Nashonda Michelle Hunter, no other names; DOB [REDACTED] 1982; SSN: [REDACTED]
[REDACTED] Current address: [REDACTED] Charleston, SC 29407 since 2020.

Plaintiff addresses (all rentals):

[REDACTED] Charlotte, NC 28269(2008-2009);
[REDACTED] Drive, Charleston, SC 29414 (2009-2016);
[REDACTED] Charleston, SC 29414 (2015-2016); and
[REDACTED], Charleston, SC 29407 (2016-2019).

2. For each of the Plaintiffs, describe the date and the precinct, county, and state in which you are or have been registered to vote for the years 2008 through the present. Document the inclusive months and years you were registered to vote in each precinct, county, and state.

Answer: I do not recall my precinct before 2020, but I believe I voted at the Drayton Hall Precinct. Since 2020, Plaintiff Hunter has been registered in Saint Andrews 20, Charleston County, SC.

3. For each of the Plaintiffs, describe every election in which you voted by year and type of election, (e.g. primary, general, special).

Answer: I have voted regularly during the stated period, including primary and general elections in 2008 and 2012 and most pothor elections. Specific records show I voted in the following:

2016 Presidential Primary and General;
2018 Primary;
2019 Charleston Municipal;
2020 Presidential Primary, State Primary and General;
2022 Primary and General; and
2023 Charleston Municipal.

4. For each of the Plaintiffs, for every election described in response to Interrogatory number 3, indicate:

- a. the method of voting you used; and
- b. whether you requested an absentee ballot application, and if so, the county board of voter registration and elections to which the request was made, the absentee application excuse identified on the request, whether the application was granted or denied, and if denied, the reason for the denial.

Answer: a. Plaintiff Hunter has always voted on the voting machines, either at my regular polling place or at headquarters when I voted “absentee” or “early”.

b. No.

5. For each of the Plaintiffs, describe all election(s) in which you were unable to cast a ballot because you could not vote absentee by mail and the reason you were unable to cast a ballot on election day in this election.

Answer: None.

6. For each of the Plaintiffs, describe your employment status for the years 2008 through the present. For each employer or school listed, document the inclusive months and years you were employed or in school, the address of the employer or school, and the date of graduation if applicable.

Answer:

2008 – None;

2009 – Various temporary work agencies in Charlotte, NC;

2010-2012 – Charity Baptist Church, 1544 E. Montague, N. Charleston, SC 29405;

2012-2014 – Zero George, 0 George Street, Charleston, SC 29401;

2015-2017 – Family Legal Services, West Montague Avenue, North Charleston, SC;

2017-2018 Maris deHart, 32 Vendue Range, Charleston, SC 29401;

2018-2024 – Charity Foundation, 1544 E. Montague, N. Charleston, SC 29405;

2024-present – Our Lady of Mercy Community Outreach, P.O. Box 607, Johns Island, SC 29455.

7. For each of the Plaintiffs, state whether you contend that you currently qualify or have ever qualified to vote absentee under S.C. Code Ann. §§ 7-15-110, 7-15-320, 7-15-600, *et. seq.*, or any other current or former provision of Title 7 of the S.C. Code Ann., and describe the qualification.

Answer: No, except that at certain times I have met the “out of country” criteria.

Under penalty of perjury, I declare that the foregoing answers are true and correct.


Nashonda Hunter

7/11/2024
Date

Date: July __, 2024

s/Armand Derfner

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